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September 9, 2011

Clerk of Court United States District Court Eastern District of Virginia 701 East Broad Street Richmond, VA 23219

Re: 3:11-ev-00061-HEH-DWD

Navigators Insurance Company v. Verizon Virginia, Inc. (the "Litigation")

Dear Clerk:

Steven G. Popps is slated to join our Richmond office as an associate on September 12, 2011. Steven has informed us that while clerking for the United States District Court for the Eastern District of Virginia ("the Court"), he worked on the Litigation.

I am writing to advise that McGuireWoods represents Verizon Virginia, Inc., a party in the Litigation. As required by Virginia Rule of Professional Conduct 1.12(c), McGuireWoods has established a formal ethics screen that will preclude Steven from participating in the Litigation after he joins McGuireWoods. He will not be apportioned any part of the fees McGuireWoods earns in connection with the Litigation.

This letter provides written notice to the Court and all the parties, as required by Rule 1.12(c), of the steps McGuireWoods has undertaken to address the conflict associated with Steven joining our firm. If you have any questions or concerns, please call me.

Sincerely,

Matthew S. Branson

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c: Steven G. Popps
Theodore Brenner
James Magner
William Mullin
Kevin O'Brien
Clinton Verity
Collin Hite
Barbara Ann Williams